

Exhibit B

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BY EMAIL

October 2, 2014

Bruce E. Clarke, Esq.
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125 Broad Street
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Re: *In re Lehman Brothers Holdings, Inc. et al.*, Case No. 08-13555 (SCC);
In re Lehman Brothers Holdings Inc. and Lehman Brothers Special Financing, Inc. v.
Giants Stadium LLC, Adversary Proc. No. 13-01554 (SCC)

Dear Bruce:

I write in reply to your letter of September 11, 2014, sent in response to my letter of August 29, 2014, which asked Giants Stadium to withdraw certain discovery-related motions [Dkt. Nos. 36874 and 39898] (the "Motions").

We are pleased that you recognize that the Motions are moot. Cluttering the docket with these Motions, subject to repeated adjournment, wastes resources and serves no valid purpose. Giants Stadium should therefore withdraw the Motions. There is no basis and it is inappropriate for Giants Stadium to condition the withdrawal of these now stale Motions on anything.

Moreover, your proposal for Rule 42(a) consolidation is premature. The parties have agreed and the Court has already for all practical purposes consolidated the adversary proceeding and claims objection for purposes of pretrial discovery. *See* Stipulation and Scheduling Order, July 21, 2014 [ECF No. 33; Case No. 13-01554]. In that Scheduling Order, the Court declined to address trial issues. We are willing to confer with you concerning consolidation of the adversary proceeding and claims objection for trial purposes at or near the end of fact discovery when the parties have seen the developed record—and long before the Court is likely to address that issue in a subsequent scheduling order.

In the meantime, we look forward to the withdrawal of the Motions.

Sincerely,



Eric C. Hawkins